

**Remarks**

The Office Action mailed February 24, 2004 has been carefully reviewed and the foregoing amendment has been made in consequence thereof.

Claims 1-22 are pending in this application. Claims 1-20 stand rejected. Claims 21-22 have been newly added.

A fee calculation sheet for the newly added claims along with authorization to charge a deposit account in the amount of the calculated fee are submitted herewith.

The rejection of Claims 1-9 and 11-20 under 35 U.S.C. § 103(a) as being unpatentable over Thearling (U.S. Patent No. 6, 240,411) in view of Direct Marketing Magazine, *Increasing Customer Value By Integrating Data Mining and Campaign Management Software*, Kurt Thearling, (February 1999) (referred to herein as “Direct Marketing”) and in further view of Lee et al. (U.S. Patent No. 6,542,894) (“Lee”) is respectfully traversed.

Applicants respectfully submit that none of Thearling, Direct Marketing, or Lee, considered alone or in combination, describe or suggest the claimed invention. As discussed below, none of Thearling, Direct Marketing, or Lee, considered alone or in combination, describe or suggest a method of evaluating marketing campaign data that includes determining a sequential order for combining models, and combining the models in the determined sequential order to generate marketing campaign data including a target group by defining an initial customer group, wherein the initial customer group includes a list of customers satisfying each of the combined models and rank ordered by projected profitability wherein projected profitability is based on at least one of a probable response by a customer to the marketing campaign, attrition of the customer, and risk associated with the customer.

Furthermore, none of Thearling, Direct Marketing, or Lee, considered alone or in combination, describe or suggest an initial customer group list that has a high profit end, a moderate profit section, and a low profit end, wherein the high profit end includes customers having a highest projected profitability, the low profit end includes customers having a lowest projected profitability, and the moderate profit section includes a profitability baseline, wherein

the determined sequential order provides a greater number of customers included between the high profit end and the profitability baseline than any other sequential order of combining the models, and wherein the target group includes the customers included between the high profit end of the list and the profitability baseline.

Moreover, none of Thearling, Direct Marketing, or Lee, considered alone or in combination, describe or suggest evaluating the model combination using structures that segment gains charts to discover where the model combination is under performing, and evaluating a performance of the model combination over time.

As acknowledged by the Office Action, neither Thearling nor Direct Marketing, alone or in combination, describe or teach “an ordering of two or more combined models.” Moreover, as described below in detail, Lee does not describe or teach combining models in a determined sequential order as recited in the present claims.

Thearling describes a method and apparatus for classifying a plurality of records in a database (10) that includes providing a first model (16) for ascertaining a first characteristic of each of the records, forming a query that includes a reference to first model (16), using the reference to execute first model (16) to generate a score for the first characteristic of at least one of the plurality of records, and selecting a selected set of the records wherein each record of the selected set satisfies the selection criteria.

Direct Marketing is an article that generally describes utilizing data mining results to execute marketing campaigns that enhance the profitability of customer relationships. Direct Marketing defines data mining as automating the detection of relevant patterns in a database. The steps outlined for integrating data mining and campaign management include: (1) creating the model, and (2) dynamically scoring the data.

Lee describes a method for modeling expected behavior that includes segmenting a dataset (50), and then using a plurality of models (60a-60i) to score the records (51) of dataset (50). The multiple models (60a-60i) are used to model respective, corresponding segments (52a-52i). The data segments (52a-52i) are built using one or more variables that are important in the single model, and which may vary from model to model. The individual multiple models (60a-

60i) are designed and tested for the respective one of the data segments (52a-52i). The results (64a-64i) of modeling each of the data segments are fed to results combining software (32). The results (64a-64i) of modeling each of the data segments are then combined by combining software (32).

Claim 1 recites a method of evaluating marketing campaign data that includes “providing a plurality of analytic models including marketing and risk models...determining a sequential order for combining the models...combining the models in the determined sequential order to generate marketing campaign data including a target group by defining an initial customer group, the initial customer group includes a list of customers satisfying each of the combined models and rank ordered by projected profitability wherein projected profitability is based on at least one of a probable response by a customer to the marketing campaign, attrition of the customer, and risk associated with the customer, the list includes a high profit end, a moderate profit section, and a low profit end, the high profit end including customers having a highest projected profitability, the low profit end including customers having a lowest projected profitability, the moderate profit section including a profitability baseline, wherein the determined sequential order provides a greater number of customers included between the high profit end and the profitability baseline than any other sequential order of combining the models, the target group includes the customers included between the high profit end of the list and the profitability baseline...evaluating the model combination using structures that segment gains charts to discover where the model combination is under performing...evaluating a performance of the model combination over time...and defining user trends.”

None of Thearling, Direct Marketing, or Lee, considered alone or in combination, describe or suggest a method as recited in Claim 1. More specifically, none of Thearling, Direct Marketing, or Lee, considered alone or in combination, describe or suggest a method of evaluating marketing campaign data that includes determining a sequential order for combining models, and combining the models in the determined sequential order to generate marketing campaign data including a target group by defining an initial customer group, wherein the initial customer group includes a list of customers satisfying each of the combined models and rank ordered by projected profitability wherein projected profitability is based on at least one of a

probable response by a customer to the marketing campaign, attrition of the customer, and risk associated with the customer.

Furthermore, none of Thearling, Direct Marketing, or Lee, considered alone or in combination, describe or suggest an initial customer group list that has a high profit end, a moderate profit section, and a low profit end, wherein the high profit end includes customers having a highest projected profitability, the low profit end includes customers having a lowest projected profitability, and the moderate profit section includes a profitability baseline, wherein the determined sequential order provides a greater number of customers included between the high profit end and the profitability baseline than any other sequential order of combining the models, and wherein the target group includes the customers included between the high profit end of the list and the profitability baseline.

Moreover, none of Thearling, Direct Marketing, or Lee, considered alone or in combination, describe or suggest evaluating the model combination using structures that segment gains charts to discover where the model combination is under performing, and evaluating a performance of the model combination over time.

Rather, Thearling describes a method and apparatus for classifying a plurality of records in a database that includes forming a query that includes a reference to a first model, and using the reference to execute the first model to generate a score for the first characteristic of at least one of the plurality of records in a database; Direct Marketing generally describes utilizing data mining results to execute marketing campaigns that enhance the profitability of customer relationships; and Lee describes a method for modeling expected behavior that includes segmenting a dataset, scoring the records included in the dataset using a plurality of models wherein a model scores a respective, corresponding segment, and then the results of modeling each of the data segments are fed to a results combining software.

As acknowledged by the Office Action at page 4, neither Thearling nor Direct Marketing, alone or in combination, describe or teach “an ordering of two or more combined models.” Moreover, as described below, Lee does not describe or teach combining models in a determined sequential order as recited in the present claims. The Office Action suggests at page 4 that “Lee

teaches determine a sequential order for combining models...and using the combined models in determined sequential order to generate marketing campaign data”. Applicants respectfully traverse this suggestion and submit that Lee does not teach combining models as recited in Claim 1.

Lee describes a method for modeling expected behavior using data segmentation and multiple models. More specifically, Lee describes the method at col. 3, line 63 to col. 4, line 18 as follows:

In many real world modeling problems, often a single variable or set of input variables has a significantly strong influence on predicting behavioral outcomes. The data mining software 30 described below allows for execution of multiple models based on selective segmentation of data using models designed for and trained with the particular data segments. The data mining software includes the results combining software 32 that combines the results from these multiple segmented-model executions into a single, summary representation of the results.

Preferably, the multiple segmented-model executions are combined into a single, summary representation of the results that maintains an order of results within a model execution while arranging results in descending order among different model executions.

The results combining software 32 provides an optimal combination of results from multiple models. The results combining software 32 can render the results in any of a number of ways to the user, for example, the model scores, a summary RMS error and  $R^2$  values, or a confusion matrix, or summary gains table or summary lift chart can be used. The results combining software 32 will describe the generation of a summary lift chart.

In other words, Lee describes a method for modeling expected behavior that includes segmenting a dataset, and then scoring the records included in the dataset using a plurality of models wherein each segment is scored using a model that is designed and tested for that particular segment. The results of modeling each of the data segments are then combined by a combining software.

In contrast to the present invention, Lee does not describe or teach combining models in a determined sequential order to generate marketing campaign data including a target group by defining an initial customer group, wherein the initial customer group includes a list of customers satisfying each of the combined models and rank ordered by projected profitability. Rather, the results in Lee are from combining the results of modeling each of the data segments. Thus, the results in Lee do not satisfy each of the applied models because in Lee each model is

only applied to a single data segment. Accordingly, Lee does not describe or teach combining models in a determined sequential order to define an initial customer group that includes a list of customers satisfying each of the combined models.

Moreover, Lee does not describe or teach an initial customer group list that includes a high profit end, a moderate profit section, and a low profit end, wherein the high profit end includes customers having a highest projected profitability, the low profit end includes customers having a lowest projected profitability, and the moderate profit section includes a profitability baseline, wherein the determined sequential order provides a greater number of customers included between the high profit end and the profitability baseline than any other sequential order of combining the models, and wherein the target group includes the customers included between the high profit end of the list and the profitability baseline. Notably, Lee does not describe, teach, or even mention determining a sequential order for combining models wherein the determined sequential order provides a greater number of customers included between a high profit end and a profitability baseline than any other sequential order of combining the models.

The Office Action further suggests at page 3 that Thearling describes “evaluating a performance of the model combination over time”. Although Thearling discusses at col. 6, lines 34-37 “a model evaluator, responsive to the selection criteria processor, to evaluate the model”, Thearling does not describe nor suggest evaluating a model combination using structures that segment gains charts to discover where the model combination is under performing, and evaluating a performance of the model combination over time. In fact, as acknowledged by the Office Action, Thearling does not disclose combining models. Therefore, Thearling could not describe or teach evaluating a model combination.

The Office Action also suggests at page 17 that Thearling teaches “an evaluator” in the form of “SAS and SPSS”. The Office Action states that SAS and SPSS are “old and very well known tools in the art of statistical analysis used to perform time-series analysis”. However, the Thearling reference, including its mentioning of SAS and SPSS, fails to describe or teach evaluating a model combination using structures that segment gains charts to discover where the model combination is under performing, and evaluating a performance of the model combination

over time. Accordingly, Applicants respectfully submit that Claim 1 is patentable over Thearling in view of Direct Marketing and further in view of Lee.

Claims 2-8 depend, directly or indirectly, from independent Claim 1. When the recitations of Claims 2-8 are considered in combination with the recitations of Claim 1, Applicants submit that dependent Claims 2-8 likewise are patentable over Thearling in view of Direct Marketing and further in view of Lee.

Claim 9 recites a system for evaluating marketing campaign data that includes “a customer database further comprising historical campaign results...a graphical user interface for presentation of trend analysis data...and a targeting engine embedded with a plurality of analytic models including marketing and risk models, the marketing models include at least one of a net present value/profitability model, a prospect pool model, a net conversion model, an attrition model, a response model, a revolver model, a balance transfer model, and a reactivation model, the risk models include at least one of a payment behavior prediction model, a delinquency model, a bad debt model, a fraud detection model, a bankruptcy model, and a hit and run model, wherein the targeting engine is configured to...determine a sequential order for combining the models...combine the models in the determined sequential order to generate marketing campaign data including a target group by defining an initial customer group, the initial customer group includes a list of customers satisfying each of said combined models and rank ordered by projected profitability wherein projected profitability is based on at least one of a probable response by a customer to the marketing campaign, attrition of the customer, and risk associated with the customer, the list includes a high profit end, a moderate profit section, and a low profit end, the high profit end including customers having a highest projected profitability, the low profit end including customers having a lowest projected profitability, the moderate profit section including a profitability baseline, wherein the determined sequential order provides a greater number of customers included between the high profit end and the profitability baseline than any other sequential order of combining the models, the target group includes the customers included between the high profit end of the list and the profitability baseline...evaluate the model combination using structures that segment gains charts to discover where the model combination is under performing...evaluate a performance of the model combination over time...and define trends relating to the marketing campaign data.”

None of Thearling, Direct Marketing, or Lee, considered alone or in combination, describe or suggest a system as recited in Claim 9. More specifically, none of Thearling, Direct Marketing, or Lee, considered alone or in combination, describe or suggest a system for evaluating marketing campaign data that includes a targeting engine configured to determine a sequential order for combining models, and combine the models in the determined sequential order to generate marketing campaign data including a target group by defining an initial customer group that includes a list of customers satisfying each of said combined models and rank ordered by projected profitability, wherein projected profitability is based on at least one of a probable response by a customer to the marketing campaign, attrition of the customer, and risk associated with the customer.

Furthermore, none of Thearling, Direct Marketing, or Lee, considered alone or in combination, describe or suggest an initial customer group list that includes a high profit end, a moderate profit section, and a low profit end, wherein the high profit end includes customers having a highest projected profitability, the low profit end includes customers having a lowest projected profitability, and the moderate profit section includes a profitability baseline, wherein the determined sequential order provides a greater number of customers included between the high profit end and the profitability baseline than any other sequential order of combining the models, and wherein the target group includes the customers included between the high profit end of the list and the profitability baseline.

Moreover, none of Thearling, Direct Marketing, or Lee, considered alone or in combination, describe or suggest a targeting engine configured to evaluate the model combination using structures that segment gains charts to discover where the model combination is under performing, and evaluate a performance of the model combination over time.

Rather, Thearling describes a method and apparatus for classifying a plurality of records in a database that includes forming a query that includes a reference to a first model, and using the reference to execute the first model to generate a score for the first characteristic of at least one of the plurality of records in a database; Direct Marketing generally describes utilizing data mining results to execute marketing campaigns that enhance the profitability of customer relationships; and Lee describes a method for modeling expected behavior that includes



segmenting a dataset, scoring the records included in the dataset using a plurality of models wherein a model scores a respective, corresponding segment, and then the results of modeling each of the data segments are fed to a results combining software.

The Office Action acknowledges at page 4 that neither Thearling nor Direct Marketing, alone or in combination, describe or teach “an ordering of two or more combined models.” Moreover, as discussed herein, Lee does not describe or teach combining models in a determined sequential order as recited in the present claims. Rather, Lee describes a method for modeling expected behavior that includes segmenting a dataset, and then scoring the records included in the dataset using a plurality of models wherein each segment is scored using a model that is designed and tested for that particular segment. The results of modeling each of the data segments are then combined by a combining software. In contrast to the present invention, Lee does not describe or teach combining models in a determined sequential order to generate marketing campaign data including a target group by defining an initial customer group, wherein the initial customer group includes a list of customers satisfying each of the combined models and rank ordered by projected profitability. Rather, the results in Lee are from combining the results of modeling each of the data segments. Thus, the results in Lee do not satisfy each of the applied models because in Lee each of the models is only applied to a single data segment. Accordingly, Lee does not describe or teach combining models in a determined sequential order to define an initial customer group that includes a list of customers satisfying each of the combined models.

Moreover, Lee does not describe or teach an initial customer group list that includes a high profit end, a moderate profit section, and a low profit end, wherein the high profit end includes customers having a highest projected profitability, the low profit end includes customers having a lowest projected profitability, and the moderate profit section includes a profitability baseline, wherein the determined sequential order provides a greater number of customers included between the high profit end and the profitability baseline than any other sequential order of combining the models, and wherein the target group includes the customers included between the high profit end of the list and the profitability baseline. Notably, Lee does not describe, teach, or even mention determining a sequential order for combining models wherein the determined sequential order maximizes the number of customers included between a high

profit end and a profitability baseline. Accordingly, Applicants respectfully submit that Claim 9 is patentable over Thearling in view of Direct Marketing and further in view of Lee.

Claims 11-19 depend, directly or indirectly, from independent Claim 9. When the recitations of Claims 11-19 are considered in combination with the recitations of Claim 9, Applicants submit that dependent Claims 11-19 likewise are patentable over Thearling in view of Direct Marketing and further in view of Lee.

Claim 20 recites a method of evaluating marketing campaign data that includes “storing in a database historical data for a plurality of potential customers including for each potential customer at least one of an age, a gender, a marital status, an income, a transaction history, and a transaction measure...providing a plurality of analytic models including marketing and risk models, the marketing models include at least one of a net present value/profitability model, a prospect pool model, a net conversion model, an attrition model, a response model, a revolver model, a balance transfer model, and a reactivation model, the risk models include at least one of a payment behavior prediction model, a delinquency model, a bad debt model, a fraud detection model, a bankruptcy model, and a hit and run model...determining a sequential order for combining the models by applying each model to be combined to each of the plurality of potential customers included in the database...combining the models in the determined sequential order to generate marketing campaign data including a target group by defining an initial customer group, the initial customer group includes a list of customers satisfying each of the combined models and rank ordered by projected profitability wherein projected profitability is based on at least one of a probable response by a customer to the marketing campaign, attrition of the customer, and risk associated with the customer, the list includes a high profit end, a moderate profit section, and a low profit end, the high profit end including customers having a highest projected profitability, the low profit end including customers having a lowest projected profitability, the moderate profit section including a profitability baseline, wherein the determined sequential order provides a greater number of customers included between the high profit end and the profitability baseline than any other sequential order of combining the models, the target group includes the customers included between the high profit end of the list and the profitability baseline...generating gains charts by comparing customers included in the target group to corresponding marketing campaign results...evaluating the model combination by using

structures that segment gains charts to identify where the model combination is under performing...evaluating over time and over a plurality of marketing campaigns at least one of a performance of the model combination...and identifying user defined trends including identifying trends within segments by analyzing structures of a plurality of marketing campaigns in chronological order.”

None of Thearling, Direct Marketing, or Lee, considered alone or in combination, describe or suggest a method as recited in Claim 20. More specifically, none of Thearling, Direct Marketing, or Lee, considered alone or in combination, describe or suggest a method that includes storing in a database historical data for a plurality of potential customers including for each potential customer at least one of an age, a gender, a marital status, an income, a transaction history, and a transaction measure, and providing a plurality of analytic models including marketing and risk models, wherein the marketing models include at least one of a net present value/profitability model, a prospect pool model, a net conversion model, an attrition model, a response model, a revolver model, a balance transfer model, and a reactivation model, and wherein the risk models include at least one of a payment behavior prediction model, a delinquency model, a bad debt model, a fraud detection model, a bankruptcy model, and a hit and run model.

Furthermore, none of Thearling, Direct Marketing, or Lee, considered alone or in combination, describe or suggest a method that includes determining a sequential order for combining the models by applying each model to be combined to each of the plurality of potential customers included in the database, and combining the models in the determined sequential order to generate marketing campaign data including a target group by defining an initial customer group that includes a list of customers satisfying each of the combined models and rank ordered by projected profitability, wherein projected profitability is based on at least one of a probable response by a customer to the marketing campaign, attrition of the customer, and risk associated with the customer.

Moreover, none of Thearling, Direct Marketing, or Lee, considered alone or in combination, describe or suggest an initial customer group list that includes a high profit end, a moderate profit section, and a low profit end, wherein the high profit end includes customers

having a highest projected profitability, the low profit end includes customers having a lowest projected profitability, and the moderate profit section includes a profitability baseline, wherein the determined sequential order provides a greater number of customers included between the high profit end and the profitability baseline than any other sequential order of combining the models, and wherein the target group includes the customers included between the high profit end of the list and the profitability baseline.

Additionally, none of Thearling, Direct Marketing, or Lee, considered alone or in combination, describe or suggest a method that includes generating gains charts by comparing customers included in the target group to corresponding marketing campaign results, evaluating the model combination by using structures that segment gains charts to identify where the model combination is under performing, evaluating over time and over a plurality of marketing campaigns at least one of a performance of the model combination, and identifying user defined trends including identifying trends within segments by analyzing structures of a plurality of marketing campaigns in chronological order.

Rather, Thearling describes a method and apparatus for classifying a plurality of records in a database that includes forming a query that includes a reference to a first model, and using the reference to execute the first model to generate a score for the first characteristic of at least one of the plurality of records in a database; Direct Marketing generally describes utilizing data mining results to execute marketing campaigns that enhance the profitability of customer relationships; and Lee describes a method for modeling expected behavior that includes segmenting a dataset, scoring the records included in the dataset using a plurality of models wherein a model scores a respective, corresponding segment, and then the results of modeling each of the data segments are fed to a results combining software.

As acknowledged by the Office Action at page 4, neither Thearling nor Direct Marketing, alone or in combination, describe or teach “an ordering of two or more combined models.” Moreover, Lee does not describe or teach combining models in a determined sequential order as recited in the present claims. Rather, Lee describes a method for modeling expected behavior that includes segmenting a dataset, and then scoring the records included in the dataset using a plurality of models wherein each segment is scored using a model that is designed and tested for

that particular segment. In contrast to the present invention, Lee does not describe or teach determining a sequential order for combining the models by applying each model to be combined to each of the plurality of potential customers included in the database, and combining the models in the determined sequential order to generate marketing campaign data including a target group by defining an initial customer group, wherein the initial customer group includes a list of customers satisfying each of the combined models and rank ordered by projected profitability. The results in Lee do not satisfy each of the applied models because in Lee each of the models is only applied to a single data segment. Accordingly, Lee does not describe or teach combining models in a determined sequential order as recited in Claim 20.

For at least the reasons set forth above, Applicants respectfully request that the 35 U.S.C. § 103(a) rejection of Claims 1-9 and 11-20 be withdrawn.

The rejection of Claim 10 under 35 U.S.C. § 103(a) as being unpatentable over Thearling (U.S. Patent No. 6,240,411) (“Thearling”) in view of Direct Marketing Magazine, *Increasing Customer Value By Integrating Data Mining and Campaign Management Software*, Kurt Thearling, (February 1999) (referred to herein as “Direct Marketing”) in further view of Lee et al. (U.S. Patent No. 6,542,894) (“Lee”) and in further view of *Building Data Mining Applications for CRM*, Alex Berson et al., (December 1999) (“Berson”) is respectfully traversed.

Thearling, Direct Marketing, and Lee are all described above. The Berson reference provided by the Examiner is a portion of a table of contents for a book. Berson lists Chapter 4 as “Data Warehousing Components”, and further lists a section within Chapter 4 as “OLAP Tools”. Berson, however, does not describe nor suggest a targeting engine configured to determine a sequential order for combining models, combine the models in the determined sequential order to generate marketing campaign data, evaluate the model combination using structures that segment gains charts to discover where the model combination is under performing, evaluate a performance of the model combination over time, and define trends relating to the marketing campaign data.

Claim 10 depends from independent Claim 9. Claim 9 is recited hereinabove.

None of Thearling, Direct Marketing, Lee, or Berson, considered alone or in combination, describe or suggest a system as recited in Claim 9. More specifically, none of Thearling, Direct Marketing, Lee, or Berson, considered alone or in combination, describe or suggest a system for evaluating marketing campaign data that includes a targeting engine configured to determine a sequential order for combining models, and combine the models in the determined sequential order to generate marketing campaign data including a target group by defining an initial customer group that includes a list of customers satisfying each of said combined models and rank ordered by projected profitability, wherein projected profitability is based on at least one of a probable response by a customer to the marketing campaign, attrition of the customer, and risk associated with the customer.

Furthermore, none of Thearling, Direct Marketing, Lee, or Berson, considered alone or in combination, describe or suggest an initial customer group list that includes a high profit end, a moderate profit section, and a low profit end, wherein the high profit end includes customers having a highest projected profitability, the low profit end includes customers having a lowest projected profitability, and the moderate profit section includes a profitability baseline, wherein the determined sequential order provides a greater number of customers included between the high profit end and the profitability baseline than any other sequential order of combining the models, and wherein the target group includes the customers included between the high profit end of the list and the profitability baseline.

Moreover, none of Thearling, Direct Marketing, Lee, or Berson, considered alone or in combination, describe or suggest a targeting engine configured to evaluate the model combination using structures that segment gains charts to discover where the model combination is under performing, and evaluate a performance of the model combination over time.

Rather, Thearling describes a method and apparatus for classifying a plurality of records in a database that includes forming a query that includes a reference to a first model, and using the reference to execute the first model to generate a score for the first characteristic of at least one of the plurality of records in a database; Direct Marketing generally describes utilizing data mining results to execute marketing campaigns that enhance the profitability of customer relationships; Lee describes a method for modeling expected behavior that includes segmenting a

dataset, scoring the records included in the dataset using a plurality of models wherein a model scores a respective, corresponding segment, and then the results of modeling each of the data segments are fed to a results combining software; and Berson mentions OLAP tools. Accordingly, Applicants respectfully submit that Claim 9 is patentable over Thearling in view of Direct Marketing in further view of Lee and in further view of Berson.

When the recitations of Claim 10 are considered in combination with the recitations of Claim 9, Applicants submit that dependent Claim 10 likewise is patentable over Thearling in view of Direct Marketing in further view of Lee and in further view of Berson.

For at least the reasons set forth above, Applicants respectfully request that the 35 U.S.C. § 103(a) rejection of Claim 10 be withdrawn.

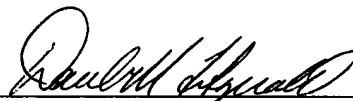
Newly added Claim 21 depends from independent Claim 1, which is submitted in a condition for allowance and patentable. Claim 21 recites a method further comprising “determining a sequential order for combining the models by applying each model to be combined to each of the plurality of potential customers included in the database, and combining the models in the determined sequential order to define the initial customer group by applying a first model included in the determined sequential order to each of the plurality of potential customers included in the database to generate a first segment of only those potential customers satisfying the first model, applying a second model included in the determined sequential order to the first segment to generate a second segment of only those potential customers satisfying the combination of the first and second models, and then applying each subsequent model included in the determined sequential order to a segment generated by the combination of each prior model.” None of the cited references describe or suggest combining models in the determined sequential order as recited in Claim 21. Accordingly, Applicants respectfully submit that Claim 21 is patentable over the cited references.

Newly added Claim 22 depends from independent Claim 9, which is submitted in a condition for allowance and patentable. Claim 22 recites a system further comprising a targeting engine configured to “determine a sequential order for combining the models by applying each model to be combined to each of the plurality of potential customers included in said

database...and combine the models in the determined sequential order to define the initial customer group by applying a first model included in the determined sequential order to each of the plurality of potential customers included in the database to generate a first segment of only those potential customers satisfying the first model, applying a second model included in the determined sequential order to the first segment to generate a second segment of only those potential customers satisfying the combination of the first and second models, and then applying each subsequent model included in the determined sequential order to a segment generated by the combination of each prior model.” None of the cited references describe or suggest combining models in the determined sequential order as recited in Claim 22. Accordingly, Applicants respectfully submit that Claim 22 is patentable over the cited references.

In view of the foregoing amendments and remarks, all the claims now active in this application are believed to be in condition for allowance. Reconsideration and favorable action is respectfully solicited.

Respectfully Submitted,



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